



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

328703

ORIGINAL
(Red)

"MAY 11 1994"

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Allied-Signal, Incorporated
101 Columbia Road
Law Department
Morristown, NJ 07962

Attn: David P. Cooke, Esquire

Re: Hanlin-Allied Site
Moundsville, West Virginia

Dear Mr. Cooke:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Hanlin-Allied Site, Moundsville, West Virginia (the "Site"). Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), Allied-Signal, Incorporated (formerly known as Allied Chemical & Dye Corporation and f/k/a Allied Chemical Corporation) ("Allied") is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and/or pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the Site or the surrounding area (see enclosed location map).

Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information are provided below. Please respond for all materials which are hazardous or potentially hazardous.

As used herein, the term "documents" means: writings (handwritten, typed, or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

Instructions for responding to the inquiries are as follows:

- a) A separate narrative response must be made for each question set forth, and for each subpart of each question.
- b) Precede each answer with the corresponding number of the question and subpart to which it responds.
- c) Provide the name, address, telephone number and job title of each person assisting you in the preparation of your responses.
- d) In the event information or documents responsive to the inquiry are not available, state what steps were taken to obtain the information or documents.

QUESTIONS

1) Provide the dates that Allied owned and operated any portion of the Site.

2) Identify the person(s) from whom Allied purchased any portion of the Site. Include in your response the last known address, contact person.

3) At the time Allied purchased any portion of the Site, describe the operation being conducted.

4) Describe the nature of Allied's operations conducted at Site during the time period in which Allied owns and/or owned a portion of the Site.

5) Identify all substances (hazardous and/or non-hazardous) (i.e., raw materials) used in the operations described above and provide Material Safety Data Sheets (MSDSs) for all such substances.

6) Identify all by-products and wastes produced through the operations (including generic or brand name and chemical composition). With respect to each such by-product and waste identified, further provide:

a) the nature of each such by-product or waste produced during the time in which Allied owned and operated a portion of the Site, including chemical content, characteristics, and physical state (i.e., liquid, solid);

b) the annual quantity of each such by-product and waste produced during the operations;

c) the process for which each such by-product or waste was generated; and

d) the chemical analyses for each by-product or waste generated.

7) Describe the methods used by Allied to dispose of or treat each such substance, by-product and waste described in Question #6(a-d). Please provide all relevant information and documentation as it relates to this question, including;

a) If each such substance, by-product and waste was disposed of on any portion of the Site, please provide a description of where the disposal occurred and the time-frame that such disposal occurred. Your response should include a map detailing such disposal locations; and

b) If such disposal locations were subsequently closed (either formally or otherwise), provide the methods, procedures, plans, etc., if any, that were followed in closing such locations.

8) Did Allied ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste at or near the Site? If the answer is yes, identify the following:

a) the date(s) the spill(s)/release(s) occurred;

b) the composition (i.e. chemical analysis) of the materials which were spilled/released; and

c) the response made by you or on your behalf with respect to the spill(s)/release(s).

9) Did you or any person or entity on Allied's behalf ever conduct any environmental (remedial, removal, ecological, human health, hydrogeological, etc.) assessments and/or investigations on any portion of the Site? If so, please list and provide all documents pertaining to such assessments or investigations.

10) Identify whether any sampling or other field activities have taken place, or are taking place, at any portion of the Site owned by Olin Corporation to monitor or assess soil, groundwater or other environmental media. Please describe all activities and provide any documents (other than those already documented to be in EPA's possession) relating to the procedures followed and the results obtained from such activities (e.g. sampling plans, analytical results, etc.)

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

EPA may contract with one or more of the following independent contracting firms to review the documentation, including documents which you claim are confidential business information ("CBI") which you submit in response to this information request, depending on available agency resources. The contractor will be filing, organizing, analyzing and/or summarizing the information for agency personnel. EPA's contractors are: Booz-Allen & Hamilton, Inc. (subcontractors to Booz Allen & Hamilton, Inc. are: CDM-Federal Programs Corporation, Dynamac Corporation, PRC Environmental Management, Inc., and CACI, Inc., Hydraulic & Water Resources Engineers, Inc., Investigative Consultant Services, Inc., Northeast Investigations, and Tri-State Enterprises), CH2MHill, Black & Veatch Waste Science and Technology Corporation, TetraTech, Inc., Ecology & Environment, Inc., Halliburton NUS Corporation (formerly known as Halliburton NUS Environmental Corporation), Environmental Technology, Inc., and Roy F. Weston, Inc. operating under contract numbers 68-W4-0010, 68-W8-0090, 68-W8-0091, 68-W8-0092, 68-W8-0085, 68-W8-0037, 68-S2-3002, and 68-W0-0036, respectively. These contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that

they handle for EPA. Section 104 of the Superfund law, and EPA's regulations at 40 C.F.R. § 2.310 provide that EPA may share such CBI with contractors. If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of these entities, you must notify EPA at the time you submit such documents.

All documents and information should be sent to:


Joan Armstrong (3HW11)
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

You must respond in writing to this required submission of information within **twenty (20) calendar days** of your receipt of this letter. For a corporation, the response must be signed by an appropriately authorized corporate official of that entity. For other entities, the response must be signed by an authorized official of that entity. If, for any reason, you do not provide all information responsive to this letter, in your answer to EPA you must: (1) describe specifically what was not provided, (2) supply to EPA a clear identification of the document(s) not provided, and (3) provide to EPA an appropriate reason why the document(s) was not provided.

If you have any question concerning this matter, please contact Joan Armstrong at (215) 597-0531. Specific legal questions should be referred to Christina M. Valente, Esq. at (215) 597-3602.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Sincerely,


Larry S. Miller, Chief
PRP Search Section

Enclosure

cc: C. Valente, 3RC33
J. Armstrong, 3HW11
D. Iacono, 3HW41
C. Wagner, 3HW33
Max Robertson, WV Dept. of Natural Resources



**-FIGURE 1-
HANLIN-ALLEGED SITE**

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092
FOR A LIST OF TOPOGRAPHIC MAPS AND SYMBOLS, IS AVAILABLE ON

PS Form 3800, June 1991

Allied-Signal, Incorporated
101 Columbia Road
Law Department
Morristown, NJ 07962

Original Provided
(Rec'd) Special Mail

P 379 777 049

is your RETURN AD-
placed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Allied-Signal, Incorporated
101 Columbia Road
Law Department
Morristown, NJ 07962

4a. Article Number

379 777 049

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, December 1991

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE

Official Business



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



JOAN ARMSTRONG
EPA REGION III
PRP SEARCH SECTION (3HW11)
841 CHESTNUT BUILDING
PHILADELPHIA, PA 19107

19107-4414 35

